

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
MIDDLE DIVISION**

ROY S. MOORE,

Plaintiff,

v.

GUY CECIL; PRIORITIES USA;
SENATE MAJORITY PAC (SMP);
BULLY PULPIT INTERACTIVE
LLC; and WATERFRONT
STRATEGIES,

Defendants.

Civil Action

Case No. 4:19-cv-01855-CLM

**DEFENDANT BULLY PULPIT INTERACTIVE LLC'S RESPONSE
TO THE COURT'S JUNE 8, 2020 ORDER**

Defendant Bully Pulpit Interactive LLC hereby responds to the Court's June 8, 2020 Order, which instructed "Defendant Bully Pulpit Interactive, LLC to disclose any and all of its members on the date the Complaint was filed that Plaintiff Moore did not list in his response to the Court's June 2, 2020 Order." ECF No. 41 at 2; *see also* ECF No. 40 (Plaintiff Moore's response to the Court's June 2, 2020 Order).

On the date the Complaint in this case was filed, there were four members of Bully Pulpit Interactive LLC that do not appear in the list compiled by Plaintiff Moore: Svoboda Capital Partners Fund IV LP; Svoboda Capital Partners Fund IV SBIC LP; Svoboda Capital Investors IV, LLC; and Lisa Shalett. None of these members are—or were during any events material to this litigation, including on the date of the filing of the Complaint in this case—citizens of Alabama.

Filed: June 12, 2020

Respectfully submitted,

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2020, I filed a copy of the foregoing Defendant Bully Pulpit Interactive LLC's Response to the Court's June 8, 2020 Order with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

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